

## COMMENTS ON DOCKET RSPA 98-4957, Notice 21

### (Pipeline Safety: Revision of Natural Gas Transmission and Gathering Pipeline Incident and Annual Report Forms)

(9/6/2000)

Colorado Interstate Gas Company offers the following comments on the referenced report forms:

#### GENERAL

CIG believes that each form should continue to be available on the OPS website, but should be reformatted such that operators may complete the form on-line and submit the completed document to OPS electronically.

#### ANNUAL REPORT

1. In **PART B, SYSTEM DESCRIPTION:** the words "pipe" and "pipeline" appear to be used interchangeably. Per the definitions in 49 CFR 192.3, the word "pipe" seems more appropriate.
2. In **PART B, 1. GENERAL:** for consistency, the word "pipe" should be added after "steel" in the heading.
3. In **PART B, 1. GENERAL:** the phrase "Miles of pipeline in the system at the end of the year.... " is an unnecessary restatement of the phrase "Report miles of pipeline in system at end of year" which is found in small print immediately to the right of the box with the words **PART B - SYSTEM DESCRIPTION.**
4. In **PART B, 1. GENERAL:** the phrase "..... that are jurisdictional to OPS" is redundant, unless OPS is trying to distinguish between interstate pipelines (jurisdictional to OPS) and intrastate pipelines (jurisdictional to the State). This needs to be explained in the associated instructions.
5. In **PART B, 1. GENERAL:** Why are there no vertical totals ?
6. In **PART B, 4. MILES of PIPE by CLASS LOCATION:** the horizontal totals are unnecessary, as they will be the same as the horizontal totals in **PART B, 3. MILES of PIPE by DECADE of INSTALLATION.**
7. In **Parts C and D,** the reference is to "leaks". On the proposed **Incident Report Form, Part A, item 4.,** it appears that leaks are distinguished from ruptures. OPS should clarify that the annual report is intended to include both leaks and ruptures in **Part C.**

INCIDENT REPORT

1. In **PART F1**, the large arrow is confusing. Since it appears that items a. through e. in section **F1** are intended to be required detail only when the cause is External Corrosion, a more intuitive layout is needed.
2. In **PART F3, item 14:** the word "bend" seems out of place in a list of causes of damage (dent, gouge, and arc burn) in the body of a pipe. How about "crack" instead?
3. In **Part F4, item 23.b.:** shouldn't this item also include a post-incident alcohol test in addition to the post-incident drug test?